

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MELISA INGRAM, STEPHANIE WILSON, and  
ROBERT REEVES,

Plaintiffs,

v.

COUNTY OF WAYNE,

Defendant.

No. 2:20-cv-10288-GCS-EAS

Honorable George Caram Steeh

Magistrate Judge Elizabeth A. Stafford

**STIPULATED ORDER EXTENDING DISCOVERY  
AND CLASS CERTIFICATION DEADLINES**

Plaintiffs Melisa Ingram, Stephanie Wilson, and Robert Reeves and Defendant County of Wayne hereby stipulate and agree (i) that Defendant will substantially complete its production in response to Plaintiffs' first set of requests for production by June 28, 2024; (ii) to extend the deadline for class certification discovery to Friday, August 9, 2024; (iii) to complete fact discovery by Friday, August 9, 2024; and (iv) that Plaintiffs will have 30 days after the close of discovery to seek class certification.

Accordingly, the Court HEREBY ORDERS that:

1. Defendant shall substantially complete its production in response to Plaintiffs' first set of requests for production by Friday, June 28, 2024.
2. The parties shall complete class certification and fact discovery by Friday, August 9, 2024.

3. After the completion of discovery, Plaintiffs will have until Friday, September 9, 2024, to file an amended motion for class certification.

IT IS SO ORDERED.

Dated: May 21, 2024

s/George Caram Steeh  
United States District Judge

Stipulated and Agreed:

/s/ Nasseem S. Ramin (with consent)

Theodore W. Seitz (P60320)

Nasseem S. Ramin (P73513)

400 Renaissance Center

Detroit, MI 48243

(313) 568-6800

tseitz@dykema.com

nramin@dykema.com

Counsel for Defendant

Dated: May 17, 2024

/s/ Michael B. Soyfer

Kirby Thomas West

(Pa. Bar 321371)

Christian Lansinger

(Md. Bar 221290007)

Michael B. Soyfer

(N.Y. Bar 5488580; D.C. Bar 230366)

INSTITUTE FOR JUSTICE

901 North Glebe Road, Suite 900

Arlington, VA 22203

(703) 682-9320

kwest@ij.org

clansinger@ij.org

msoyfer@ij.org

Barton Morris Jr. (P54701)

LAW OFFICES OF BARTON MORRIS

520 North Main Street

Royal Oak, MI 48067

(248) 541-2600

barton@bartonmorris.com

Counsel for Plaintiffs

Dated: May 17, 2024